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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Margarita Carrera,

Plaintiff,

v.

Allied Collection Services, Inc.,

Defendant.

Case No.: 2:22-cv-01604-GMN-DJA

**Stipulation and Order to Extend  
Discovery Deadlines**

**(Second request)**

Margarita Carrera ("Plaintiff") and Allied Collection Services, Inc. ("Defendant") (jointly as the "Parties"), by and through their respective counsel, hereby stipulate to modify the Court's Discovery Plan and Scheduling Order. Pursuant to LR 26-3(d), the Parties' proposed discovery schedule is listed below:

5. Discovery cutoff date: from August 14, 2023, to **September 13, 2023**;
6. Dispositive motions: from September 13, 2023, to **October 13, 2023**.
7. Pretrial order: from October 13, 2023, to **November 12, 2023**.

In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court.

1 Pursuant to LR 26-3, good cause exists to amend the Scheduling Order. The Parties  
2 have diligently pursued discovery but need additional time to complete Plaintiff's deposition of  
3 Defendant.

4 **A. Statement of Completed Discovery**

5 Plaintiff served initial disclosures, interrogatories, requests for production of documents,  
6 requests for admission, and a deposition notice on Defendant on March 20, 2023.

7 Defendant served interrogatories, requests for production of documents, and requests for  
8 admission on Plaintiff on March 30, 2023.

9 Defendant served Plaintiff with a Notice of Deposition on March 31, 2023.

10 Plaintiff responded to Defendant's written discovery requests on April 28, 2023.

11 Defendant responded to Plaintiff's written discovery requests on May 8, 2023.

12 Defendant took Plaintiff's deposition on May 18, 2023.

13 **B. Description of Remaining Discovery**

14 Pursuant to LR 26-3(b), the parties request additional time for Plaintiff to take Defendant's  
15 Deposition.

16 **C. Reasons Why Remaining Discovery Was Not Completed by Current Deadlines**

17 Pursuant to LR 26-3(c), the reason the remaining discovery was not complete within the  
18 time limits set by the discovery plan is that Defendant needed additional time to investigate and  
19 respond to Plaintiff's discovery requests which resulted in the parties agreeing to reschedule  
20 Plaintiff's deposition of Defendant. Additionally, counsel for Defendant, counsel for Plaintiff, and  
21 Defendant's witness all had pre-scheduled periods on their calendars where they were traveling  
22 for unrelated reasons and were unable to schedule or complete the deposition during those  
23 respective time periods.

24 Plaintiff and Defendant have been working together to reschedule the deposition within the  
25 confines of counsels' schedules as well as Defendant's witness' schedule and now have an agreed  
26 upon date in which all three will be available to conduct the deposition, August 30, 2023.  
27 Unfortunately this date is after the current deadline for close of discovery, August 14, 2023. The

parties have stipulated and request an order modifying the Court's Discovery Plan and Scheduling Order to allow for additional time to complete Plaintiff's deposition of Defendant.

This is the Parties' second request for an extension of these deadlines and the Parties respectfully submit that the requested extension is supported by good cause, is made in good faith, and not intended to delay these proceedings unnecessarily.

Dated: July 21, 2023.

**FREEDOM LAW FIRM, LLC**

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### **SCHEDULING ORDER**

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:

  
 UNITED STATES MAGISTRATE JUDGE

DATED: July 24, 2023